



Community Alliance
with Family Farmers

August 3, 2005

Jim Riddle, Chair of NOSB
c/o Ms. Francine Torres
USDA-AMS-TMD-NOP
1400 Independence Ave., SW
Room 4008-S, Mail Stop 0268
Washington, DC 20250-0200

Dear Jim,

This letter is written in support of the biodiversity amendments to NOSB's model Organic System Plan (OSP). Over the last ten years, I've assisted organic farmers with planting native plant hedgerows and grassed waterways in order to diversify their farms. To date, I have installed more than 50 miles in our area. Farmers like the fact that hedgerows bring natural enemy insects and other native species while also helping with erosion and dust control, wind protection, and increasing biodiversity on their farms.

Incorporating biodiversity into the Organic System Plan will help organic farmers to be better land stewards, and will encourage them to take advantage of all of what nature has to offer. Since the requirement for biodiversity conservation is already in the National Organic Program rule but has not been properly addressed, the NOSB's approval will provide consistent guidance to farmers, inspectors, certifiers and accreditation auditors. It will establish a common expectation of what it means to conserve biodiversity and to maintain or improve the natural resources of the farm or ranch, so that each certifier and farmer will not have to figure it out on their own.

This request does not seek to rewrite the rule or ask for clarification; rather it provides for biodiversity implementation.

Sincerely,

Sam Earnshaw
Regional Program Coordinator
Community Alliance with Family Farmers
PO Box 1766
Watsonville, CA 95077